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Attorneys for Defendants,
GOOGLE, INC. AND TIMOTHY ARMSTRONG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Elwell v. Google, Inc. et al Doc. 9

CHRISTINA ELWELL,

Plaintiff

v.

GOOGLE, INC. and TIMOTHY ARTMSTRONG,

Defendants.

Case No. 05 CV 6487 (DLC)

NOTICE OF MOTION FOR ADMISSION
PRO HAC VICE

PLEASE TAKE NOTICE that upon the annexed declaration of Adrian T. Delmont and all exhibits appended thereto, Defendants Google, Inc. and Timothy Armstrong (collectively "Defendants"), will move the Court before the Honorable Denise Cote, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to Local Civil Rule 1.3 admitting Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq., Gary M. Gansle, Esq., and Koray J. Bulut, Esq., to appear *pro hac vice* in the above-captioned action on behalf of Google, Inc. and Timothy Armstrong.

PLEASE TAKE FURTHER NOTICE that Defendants' motion is made on submission and that no party should appear before the Court on this motion.

Dated: New York, New York
September 2, 2005

WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION

By: [signature]
Adrian T. Delmont (AD-7010)
12 East 49th Street, 30th Floor
New York, NY 10017-8203

TO: SULLIVAN & WORCESTER, LLP
Ilene Robinson Sunshine, Esq.
One Post Office Square
Boston, MA 02109

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Attorneys for Defendants,
GOOGLE, INC. AND TIMOTHY
ARMSTRONG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL, Plaintiff v. GOOGLE, INC. and TIMOTHY ARTMSTRONG, Defendants.	Case No. 05 CV 6487 (DLC)

ORDER GRANTING *PRO HAC VICE* ADMISSIONS OF FRED W. ALVAREZ, MARINA C. TSATALIS, GARY M. GANSLE, KORAY J. BULUT

THIS MATTER having been brought before the Court by Defendants Google, Inc. and Timothy Armstrong, for an order pursuant to Local Civil Rule 1.3 admitting Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq., Gary M. Gansle, Esq., and Koray J. Bulut, Esq. to appear and participate *pro hac vice* in this action of behalf of Defendants, and for good cause shown;

IT IS on this _____ day of September, 2005;

ORDERED that Fred W. Alvarez, Esq., being a member in good standing of the bars of the State of California, the District of Columbia and the State of New Mexico, be permitted to appear *pro hac vice* in the above-captioned matter; and it is further

ORDERED that Marina C. Tsatalis, Esq., being a member in good standing of the bars of the State of California, the State of Pennsylvania, and the State of New Jersey, be permitted to appear *pro hac vice* in the above-captioned matter; and it is further

ORDERED that Gary M. Gansle, Esq., being a member in good standing of the bar of the State of California, be permitted to appear *pro hac vice* in the above-captioned matter; and it is further

ORDERED that Koray J. Bulut, Esq., being a member in good standing of the bars of the State of California and the State of Minnesota be permitted to appear *pro hac vice* in the above-captioned matter.

____
Honorable Denise Cote
United States District Judge

FRED W. ALVAREZ
MARINA C. TSATALIS
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Attorneys for Defendants,
GOOGLE, INC. AND TIMOTHY
ARMSTRONG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL, Plaintiff v. GOOGLE, INC. and TIMOTHY ARTMSTRONG, Defendants.	Case No. 05 CV 6487 (DLC)

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2005, I caused Defendants' Notice of Motion for Admission *Pro Hac Vice*, dated September 2, 2005, Declaration In Support of Motion for Admission *Pro Hac Vice*, dated September 2, 2005, and [Proposed] Order Granting *Pro Hac Vice* Admissions of Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq., Gary M. Gansle, Esq., and Koray J. Bulut, Esq., dated September 2, 2005, to be dispatched via Federal Express to the following attorney:

Ilene Robinson Sunshine, Esq.
SULLIVAN & WORCHESTER, LLP
One Post Office Square
Boston, MA 012109

Adrian T. Delmont

FRED W. ALVAREZ
MARINA C. TSATALIS
GARY M. GANSLE
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Attorneys for Defendants,
GOOGLE, INC. AND TIMOTHY
ARMSTRONG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL, Plaintiff v. GOOGLE, INC. and TIMOTHY ARMSTRONG, Defendants.	Case No. 05 CV 6487 (DLC)

DECLARATION OF ADRIAN DELMONT
IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE

I, Adrian T. Delmont, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an associate at the law firm of Wilson Sonsini Goodrich & Rosati, attorneys for the Defendants Google, Inc. and Timothy Armstrong (collectively, "Defendants") in the above-captioned action. I was admitted to practice before this court on January 20, 2004.

2. I submit this declaration in support of Defendants' motion for the *pro hac vice* admissions of Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq., Gary M. Gansle, Esq., and Koray J. Bulut, Esq.

3. Mr. Alvarez is a Member of the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bars of the State of California, the District of Columbia and the State of New Mexico.

4. Mr. Alvarez has read and is familiar with the standards for professional conudct imposed upon the members of the New York Bar, and he has assured me that he shall comply therewith.

5. Attached hereto as Exhibit A are Certificates of Good Standing for Mr. Alvarez from the State Bar of California, the District of Columbia Court of Appeals, and the Supreme Court of New Mexico issued within thirty days of this Declaration.

6. Ms. Tsatalis is a Member of the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bars of the State of California, the State of New Jersey and the State of Pennsylvania.

7. Ms. Tsatalis has read and is familiar with the standards for professional conduct imposed upon the members of the New York Bar, and she has assured me that she shall comply therewith.

8. Attached hereto as Exhibit B are Certificates of Good Standing for Ms. Tsatalis from the State Bar of California, the Supreme Court of Pennsylvania, and the Supreme Court of new Jersey issued within thirty days of this Declaration.

9. Mr. Gansle is an Associate at the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bar of the State of California.

10. Mr. Gansle has read and is familiar with the standards for professional conduct imposed upon the members of the New York Bar, and he has assured me that he shall comply therewith.

11. Attached hereto as Exhibit C is a Certificate of Good Standing for Mr. Gansle from the State Bar of California, issued within thirty days of this Declaration.

12. Mr. Bulut is an Associate at the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bars of the State of California and the State of Minnesota.

13. Mr. Bulut has read and is familiar with the standards for professional conduct imposed upon the members of the New York Bar, and he has assured me that he shall comply therewith.

14. Attached hereto as Exhibit D are Certificates of Good Standing for Mr. Bulut from the State Bars of California and the Supreme Court of Minnesota issued within thirty days of this Declaration.

15. Defendants respectfully requests that Fred Alvarez, Esq., Marina Tsatalis, Esq., Gary Gansle, Esq., and Koray Bulut, Esq. be granted admission *pro hac vice* in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 2, 2005

Adrian T. Delmont (AD-7010)

THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, FRED WILLIAM ALVAREZ was admitted to the practice of law in this state by the Supreme Court of California on December 23, 1975; that from the date of admission to January 1, 1981, he was an ACTIVE member of the State Bar of California; that on January 1, 1981, he transferred at his request to the INACTIVE status; that from that date to January 23, 1989, he was an INACTIVE member of the State Bar of California; that on January 23, 1989, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Salfiti
Custodian of Membership Records

District of Columbia Court of Appeals

Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

FRED W. ALVAREZ

was on the 12th day of APRIL, 1989 duly qualified and admitted as an attorney and counselor. This attorney is, on the date indicated below, voluntarily registered as an inactive member in good standing of the District of Columbia Bar and, therefore, is not currently eligible to practice law in the District of Columbia.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 25, 2005.

GARLAND PINKSTON, JR., CLERK

By: C. Jackson
Deputy Clerk

IN THE SUPREME COURT OF THE STATE OF NEW MEXICO

Certificate

STATE OF NEW MEXICO }
} ss.
SUPREME COURT }

I, KATHLEEN JO GIBSON, Chief Clerk of the Supreme Court of the State of New Mexico, hereby certify that ***FRED WILLIAM ALVAREZ*** *was admitted to practice law in the Supreme Court and other courts of the State of New Mexico on April 26, 1976, and has at all times since been and is now a member of the Bar of said Supreme Court in good standing.*

"Good standing" means that the attorney is current on payment of State Bar dues; has complied with Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension. No disciplinary action involving professional misconduct has been taken against the attorney's law license. This certification expires 30 days from this date, unless sooner revoked or rendered invalid by operation of rule or law.

WITNESS, My official signature and the seal of said Court this 19th day of August, 2005.

Kathleen Jo Gibson

Chief Clerk of the Supreme Court of the State of New Mexico

NOTE: Mr. Alvarez was granted inactive status on April 9, 1993.

THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MARINA CAROL TSATALIS was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1995; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Salfiti
Custodian of Membership Records

Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Marina C. Tsatalis, Esq.

DATE OF ADMISSION

December 17, 1992

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.

Witness my hand and official seal
Dated: August 24, 2005

John W. Person Jr.
Deputy Prothonotary

Supreme Court of New Jersey

Certificate of Good Standing

This is to certify that **MARINA C TSATALIS** (No. **018481992**) was constituted and appointed an Attorney at Law of New Jersey on **December 22, 1992** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this **24TH** day of **August** , 2005

Clerk of the Supreme Court

-453a-

THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, GARY MICHAEL GANSLE was admitted to the practice of law in this state by the Supreme Court of California on May 18, 1999; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Salfiti
Custodian of Membership Records

THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KORAY JAMES BULUT was admitted to the practice of law in this state by the Supreme Court of California on April 2, 2004; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Salfiti
Custodian of Membership Records

STATE OF MINNESOTA
IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following attorney is in good standing.

KORAY JAMES BULUT

was duly admitted to practice as an attorney and counselor at law in all the courts of this state on

October 25, 2002

Given under my hand and seal of this court on

August 18, 2005

Frederick K. Grittner
Clerk of Appellate Courts